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mailroom  
ACTION 4/12

## Memorandum



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EM-453.1 (J. Ciocco, 3-7459)

Review Comments for "Rocky Flats Plant Environmental Evaluation Technical Memorandum Number 3, Operable Unit 4"

R. Schassburger, Rocky Flats Office

The Office of Southwestern Area Programs, Rocky Flats/Albuquerque Production Division, has reviewed the "Rocky Flats Plant Environmental Evaluation Technical Memorandum Number 3 Addendum to Final Phase I Resource Conservation and Recovery Act Facility Investigation/Remedial Investigation Work Plan, Operable Unit (OU) 4," and has prepared the attached comments for your consideration in preparing the final document. Please address these comments during the document finalization process.

Our main concern with this document is the absence of a discussion of sample size and statistical analysis. Given the nature of the ecological resources at the site, a large enough sample size for application of statistical treatments to support decision making may not be possible to obtain. A rigorous analysis of the soil data should be performed first to determine the need for tissue sampling. The results of this investigation should then determine the necessity of tissue sampling, and in the event tissue samples are required, fewer animals might be required to support the analysis.

It is also recommended that the coordination of investigative activities at neighboring OUs be discussed further in light of the postponed OU 9 activities.

Please contact me at (301) 903-8191, or Jeff Ciocco of my staff at (301) 903-7459 if you have any questions regarding these comments.

for Jeff Ciocco  
Autar Rampertaap  
Chief

Rocky Flats Branch  
Rocky Flats/Albuquerque Production Division  
Office of Southwestern Area Programs

Attachment

cc w/attachment:  
J. Hartman, RFcc w/o attachment:  
R. Greenberg, EM-453

FOLD FOR ADDRESSEE

DATE:

4/12

ADMIN RECORD

A-DU04-000486

DOCUMENT REVIEW: ROCKY FLATS PLANT ENVIRONMENTAL EVALUATION  
TECHNICAL MEMORANDUM NUMBER 3 ADDENDUM TO FINAL PHASE I  
RESOURCE CONSERVATION AND RECOVERY ACT FACILITY INVESTIGATION/REMEDIAL  
INVESTIGATION WORK PLAN

GENERAL COMMENTS

1. The coordination of sampling with Operable Unit (OU) 6 investigations should be presented in more detail.
2. The rationale for not viewing sediment as an exposure media is reasonable. Elsewhere in the document, however, it is said that the ponds will be dried. If sludge solidification is to be used to treat the remaining material, this should be discussed. If sludge solidification will not be employed, sludge or sediment will become soil due to evaporation and would then be an exposure media.
3. It is said that the result of the Stage 1 investigative activity will be a habitat survey, a biological survey report (if endangered species are noted), and a technical report on the vegetation and small mammal investigations with histopathological information. Stage 2 investigations will result in a finalized list of contaminants of concern (COCs), a site-specific Conceptual Exposure Model, Conceptual Transport Model, measurements of target analyses in selected receptors, and data on histopathology. It is not clear how the results of these investigations will be used to determine the need for remediation.
4. A criterion for the selection of COCs includes "widely distributed" and occurring in "localized areas of high concentration." These expressions require clarification; otherwise it would appear that "professional judgement" would more accurately describe the criteria.

SPECIFIC COMMENTS

1. Page 4-4, paragraph (para.) 3: Please indicate how mammal tissue or any other samples are inadvertently collected during a habitat survey.
2. Page 5-12, para. 1: As no suitable reference area exists, it is not clear how will data pertaining to species richness and abundance will be used. These measures are only meaningful in the comparative sense. How the collected data will be used should be discussed.
3. Page 5-14, para. 1: Scat analysis should not be included as part of the OU 4-specific study for the reasons discussed in the text.

4. Page 5-18, para. 1: A chain of logic for the risk assessment is presented which begins with identification of whether or not target analyses are accumulating or concentrating in selected target receptors. The logic progression is developed around the observation of accumulating or concentrating contaminants. A chain of logic is not presented for the case in which contaminants are observed not to accumulate or concentrate. A mechanism should be in place to reach decisions (including "No Action") as early in the process as possible.
5. Page 5-19, para. 1: How acceptable environmental conditions will be estimated from the exposure assessment should be discussed.